

may be affected. Rule 24(b) provides for permissive intervention when an applicant's claim and the main action have common questions of law or fact.

3. The intervenor meets the requirements of Rule 24(a) of the Federal Rules of Civil Procedure in that she, just like the Plaintiffs in the action, seeks legal redress for the deprivation, under color of law, of the rights of families and children as secured by the United States Constitution, and other applicable law. Accordingly, disposing of the action without the intervenor may as a practical matter impair or impede intervenor's ability to protect its interest, unless the existing parties adequately represent that interest.

4. The intervenor also meets the requirements of Rule 24(b) of the Federal Rules of Civil Procedure in that both the Plaintiffs and the intervenor assert claims under 42 U.S.C. § 1983; 42 U.S.C. § 1988; 42 U.S.C. § 1985; 42 U.S.C. § 1986; Monell-Related Claims; RICO conspiracy to commit fraud; legal malpractice; medical malpractice; breach of fiduciary duty; breach of implied and express warranties; unconscionable contracts; 28 U.S.C. § 1361; Bivens Claims; and declaratory and injunctive relief; and these claims are based on substantially the same facts.

5. The intervenor's proposed intervention is timely. No dispositive motions have been filed with the Court, and discovery is not yet concluded.

WHEREFORE, the intervenor requests that this Court allow it to intervene and permit the intervenor to file a Complaint-in-Intervention. A proposed Order is attached hereto.

Dated: 12-21-2022

Respectfully submitted:

SIGNATURE: Beatrice Rivera Adams

Beatrice Rivera Adams
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Mobile, Alabama 36608
BringTateHome@gmail.com

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

Case No. 7:22-CV-178-FL

Beatrice Rivera Adams individually,

In pro persona

Plaintiff,

v.

UNITED STATES GOVERNMENT

Defendants.

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ORDER

Upon good cause shown, the intervenor's Motion to Intervene as Plaintiff-Intervenor
is granted.

DATED: _____

SIGNED: _____

CERTIFICATE OF SERVICE

I Beatrice Rivera Adams swear that on December 21, 2022 I have served

the persons and/or representative as addressed below, the following documents below:

CERTIFICATE OF INTERESTED PARTIES.

1. UNITED STATES GOVERNMENT

U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

2. JOE BIDEN

U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

3. KAMALA HARRIS

U.S. Department of Justice
950 Pennsylvania Avenue NW
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4. XAVIER BECERRA

200 Independence Avenue SW
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5. MERRICK B. GARLAND

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950 Pennsylvania Avenue NW
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6. JERRY MILNER

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7. RACHEL LEVINE

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